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[Refrigerator Rulemaking \(Docket No. EE-RM-93-801\)](#)

[U.S. Department of Energy](#)

Office of Codes and Standards, EE-43

1000 Independence Avenue SW, Room 1J-018

Washington, DC 20585-0121

COMMENTS OF THE WASHINGTON STATE DEPARTMENT OF COMMUNITY,  
TRADE AND ECONOMIC DEVELOPMENT ENERGY POLICY GROUP

ON

Energy Conservation Program for Consumer Products: Energy Conservation Standards  
for Refrigerators, Refrigerator-Freezers, and Freezers.

The Washington Department of Community, Trade and Economic Development, Energy Policy Group encourages DOE to promulgate Option #1 from the listed possible responses to Comment on Effective Date and Standard Levels. That is, to implement the agreement reached by consensus of many diverse parties reached in the fall of 1994, at the earliest reasonable date, which many parties and some manufacturers agree is January 1, 2000.

We have followed DOE's process for establishing energy efficiency standards for several years and have provided analysis and comments on various technologies. We are aware of the research, product development, estimated savings and possible costs of the proposed Option #1 refrigerator - freezer product. It is with this knowledge and for the following reasons that we support promulgation of the new standard in the timeliest manner possible.

1. The Tier One standard level is reasonable for implementation in the year 2000. During a very proactive negotiating process all manufacturers agreed to this standard 1994. This means that all manufacturers should be able to meet the higher standard now. Still even years away is the phase-out of HCFC blowing

agents in 2003; this could effect performance if there are no substitutes developed.

2. The implementation of the Tier 1 standard has already been delayed two critical years. Manufacturers have had two years to plan for the proposed upgrades. To delay the implementation date beyond January 1, 2000, would reward those manufacturers who have not planned and acted accordingly and would penalize those responsible manufacturers who have modified their design and production plans in good faith.
3. Setting energy efficiency standards for nationally manufactured equipment is most effectively achieved on the national level. It is less desirable to set standards on a state by state basis. However, if one year of a federal moratorium preventing the establishment of new standards is followed by DOE postponing the implementation of previously negotiated standards, states may interpret this as an abandonment of the process. If this is the case, states that readily perceive the savings benefits to their residents will initiate their independent standard setting processes. This would be a less desirable and less cost-effective outcome for manufacturers and consumers.

We hope that DOE does not pursue any of the remaining six options that they presented. Any of these would effectively undermine a very thorough and efficient negotiation process in which a diversity of interested parties participated. To revisit the proposed standard and the timing of its implementation sends a disastrous message to all of those who negotiated the standard and will reflect very unfavorably on DOE. To delay or diminish the standard without a meaningful technological or economic justification will result in handicapping DOE's future activities in efficiency standards. This would be a disappointing result at a time when DOE is working to increase the efficiency and effectiveness of its efficiency standard process.

In closing, we discourage DOE from revisiting the 1995 proposed rule. Instead, we recommend that DOE pursues Option #1 and implements the previously agreed efficiency level for refrigerators - freezers no later than January 1, 2000.

Sincerely,

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